

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA Title III

No. 17-BK-3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT  
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

No. 17-BK-4780-LTS

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

UNIÓN DE TRABAJADORES DE LA INDUSTRIA  
ELÉCTRICA Y RIEGO, INC.

Plaintiffs,

v.

PUERTO RICO ELECTRIC POWER AUTHORITY; THE  
FINANCIAL OVERSIGHT AND MANAGEMENT BOARD  
FOR PUERTO RICO, as representative of PUERTO RICO  
ELECTRIC POWER AUTHORITY; PUERTO RICO  
PUBLIC PRIVATE PARTNERSHIP AUTHORITY; and  
GENERA PR LLC

Defendants.

Adv. Proc. No. 23-00045-LTS

**INFORMATIVE MOTION OF SYNCORA GUARANTEE, INC.  
REGARDING THE JUNE 28, 2023 HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

1. Syncora Guarantee, Inc. (“Syncora”) submits this informative motion in response to the Court’s *Order Regarding Procedures for June 28, 2023, Hearing* (the “Order,” ECF No. 24624)<sup>2</sup> and respectfully states as follows:

2. Susheel Kirpalani of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for Syncora, will appear in person in the New York Courtroom.

3. Daniel Salinas of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for Syncora, will appear in person in the San Juan Courtroom.

4. Counsel does not intend to speak at the Hearing but reserves its right to be heard on any matter raised by or presented to the Court at the Hearing, and to respond to any statements

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Order.

made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Syncora.

5. The required Party Appearance Sheet accompanies this Informative Motion as Exhibit A.

DATED: June 23, 2023

Respectfully submitted,

REICHARD & ESCALERA

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

**By :** /s/ Rafael Escalera  
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*Co-Counsel for Syncora Guarantee, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Carlos R. Rivera-Ortiz  
USDC-PR 303409

**EXHIBIT A**

**PARTY APPEARANCE SHEET**

Name of Party	Syncora Guarantee, Inc.	
Attorney 1	Appearance Method	In Person/New York Courtroom
	Name	<b>Susheel Kirpalani</b>
	Email	susheelkirpalani@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	212-849-7200
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A
Attorney 2	Appearance Method	In Person/San Juan Courtroom
	Name	<b>Daniel Salinas</b>
	Email	danielsalinas@quinnemanuel.com
	Law Firm	Quinn Emanuel Urquhart & Sullivan, LLP
	Phone Number	202-905-4668
	Docket Entry No. of Notice of Appearance	Dkt. No. 22609 in Case No. 17-3283-LTS
	Zoom Screen Name	N/A